1	ROBERT P. VARIAN (SBN 107459)			
2	CHARLES J. HA (WA Bar No. 34430 (pro hac vice)) DAVID KEENAN (WA Bar No. 41359 (pro hac vice))			
3	CHRISTINE M. SMITH (STATE BAR NO. 267929) ORRICK, HERRINGTON & SUTCLIFFE LLP			
	405 Howard Street	405 Howard Street		
4	San Francisco, CA 94105 Telephone: (415) 773-5700			
5	Facsimile: (415) 773-5759 Email: rvarian@orrick.com			
6				
7	Attorneys for Plaintiffs [Additional Counsel appear on signature page]			
8	STUART F. DELERY			
9	Assistant Attorney General WILLIAM C. PEACHEY			
10	Director, District Court Section ELIZABETH J. STEVENS			
	Assistant Director, District Court Section			
11	JENNIFER A. BOWEN KATHERINE A. SMITH			
12	KATHERINE J. SHINNERS			
13	Trial Attorneys, Office of Immigration Litigation U.S. Department of Justice – Civil Division			
14	P.O. Box 868, Ben Franklin Station Washington, D.C. 20044			
	Telephone: (202) 616-3558			
15	Facsimile: (202)305-7000 Email: Jennifer.Bowen@usdoj.gov			
16	Attorneys for Defendants			
17	UNITED STATES DISTRICT COURT			
18				
19	NORTHERN DISTRICT OF CALIFORNIA			
20	SAN FRANCISCO DIVISION			
20	AUDLEY BARRINGTON LYON, JR., et. al.,	Case No.: 13-cv-05878 EMC		
	Plaintiffs,	JOINT STIPULATION OF VOLUNTARY		
22	v.	DISMISSAL OF LOURDES HERNANDEZ-TRUJILLO PURSUANT		
23		TO F.R.C.P. 41(a)(1)(A)(ii); [PROPOSED] ORDER		
24	UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT, et. al.,			
25		[PURSUANT TO CIVIL L.R. 7-12]		
26	Defendants.	CLASS ACTION		
27				
28				

1	The Parties in the above-captioned matter hereby file this Joint Stipulation to voluntarily		
2	dismiss Lourdes Hernandez-Trujillo as a named Plaintiff in this action as permitted by the		
3	Federal Rules of Civil Procedure Rule 41(a)(1)(A)(ii).		
5	THE PARTIES SO STIPULATE, THROUGH THEIR COUNSEL OF RECORD.		
6	Dated: March 4, 2015	ORRICK, HERRINGTON & SUTCLIFFE LLP	
7		By: /s/Robert P. Varian_	
8		ROBERT P. VARIAN (SBN 107459) CHARLES J. HA (WA Bar No. 34430 (pro hac	
9		vice)) DAVID KEENAN (WA Bar No. 41359 (pro hac	
11		vice)) CHRISTINE M. SMITH (SBN 267929)	
12		JUDY KWAN (SBN 273930) ALEXIS YEE-GARCIA (SBN 277204)	
13		MATTHEW R. KUGIZAKI (SBN 286795) JAYA KASIBHATLA (NY Bar No. 5208087 (pro	
14		hac vice))	
15		AMERICAN CIVIL LIBERTIES UNION NATIONAL PRISON PROJECT	
16		CARL TAKEI (SBN 256229)	
17		915 15th Street N.W., 7th Floor Washington, DC 20005	
18		Telephone: (202) 393-4930	
19		Facsimile: (202) 393-4931 Email: ctakei@aclu.org	
20		AMERICAN CIVIL LIBERTIES UNION	
21		FOUNDATION OF NORTHERN CALIFORNIA	
22		By:/s/ Julia Harumi Mass_ JULIA HARUMI MASS (SBN 189649)	
23		MICHAEL T. RISHER (SBN 191627)	
24		MEGAN E. SALLOMI (SBN 300580) 39 Drumm Street	
25		San Francisco, CA 94111	
26		Telephone: (415) 621-2493 Facsimile: (415) 255-8437	
27		Email: jmass@aclunc.org	
28		Attorneys for Plaintiffs	
20		1	

1	Dated: March 4, 2015		OF IMMIGRATION LITIGATION,
2			DIVISION PARTMENT OF JUSTICE
3		c	STUART DELERY
4			Assistant Attorney General
		7	WILLIAM C. PEACHEY
5			Director, District Court Section
6		T.	ELIZABETH J. STEVENS
7			Assistant Director, District Court Section
8		By: _	/s/ Katherine J. Shinners
9		•	KATHERINE J. SHINNERS
10			ENNIFER A. BOWEN KATHERINE A. SMITH
			Frial Attorney, District Court Section
11			P.O Box 868, Ben Franklin Station
12			Washington, D.C. 20044 Γelephone: (202) 616-3558
13			Email: Jennifer.bowen@usdoj.gov
14	Attorneys for Defendants		es for Defendants
15		1111011110	s jer 2 sjenaams
16	As the attorney e-filing this document, I, Robert A. Varian, attest that Julie Harumi Mass and that Jennifer A. Bowen have concurred in the filing of this document.		
17			_/s/ Robert P. Varian
18		_	ROBERT P. VARIAN
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
	Lyon, et al. v. U.S. Immigration an	d Customs	s Enforcement, et al., Case No.: 13-cv-05878 EMC

[PROPOSED] ORDER PURSUANT TO STIPULATION, IT IS SO ORDERED. Dated: _____ HONORABLE EDWARD M. CHEN United States District Judge